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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Keith White,

Case No.: 2:24-cv-00533

Plaintiff,
v.

**Discovery Plan and Scheduling
Order Submitted in Compliance
with LR 26-1(b)**

Experian Information Solutions, Inc.;
National Consumer Telecom &
Utilities Exchange, Inc.; Innovis Data
Solutions, Inc.; Clarity Services, Inc.;
Backgroundchecks.com LLC;
LoanMart; Synchrony Financial and
WebBank,

Defendants.

On April 26, 2024, Synchrony Financial appeared in this case and the Court set a deadline to file a proposed discovery plan and scheduling order by June 10, 2024. Accordingly, Keith White, Synchrony Financial, WebBank and National Consumer Telecom & Utilities Exchange, Inc. (collectively as the “Parties”), by and through their respective counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties will require 180 days of discovery measured from the date that Synchrony Financial filed its answer to Plaintiff’s complaint.

DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

1. Initial disclosures	June 25, 2024
2. Amend pleadings and add parties ..	July 25, 2024
3. Expert disclosures (initial):	August 26, 2024
4. Expert disclosures (rebuttal):	September 23, 2024
5. Discovery cutoff date:	October 23, 2024
6. Dispositive motions:	November 22, 2024
7. Pretrial order	December 23, 2024

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until **30 days after** decision on the dispositive motions or until further order of the court.

Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

1 Extensions or Modifications of the Discovery Plan and Scheduling Order:

2 Applications to extend any date set by the discovery plan, scheduling order, or other
3 order must comply with the Local Rules.

4

5 Protective Order: The parties may seek to enter a stipulated protective order
6 pursuant to Rule 26(c) prior to producing any confidential documents.

7

8 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
9 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
10 served by sending such documents by email.

11

12 Alternative Dispute Resolution Certification: The parties certify that they met
13 and conferred about the possibility of using alternative dispute-resolution processes
14 including mediation, arbitration, and early neutral evaluation. The parties have not
15 reached any stipulations at this stage.

16

17 Alternative Forms of Case Disposition Certification: The parties certify that
18 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
19 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
20

21 The parties have not reached any stipulations at this stage.

22

23 Electronically Stored Information: The parties have discussed the retention
24 and production of electronic data. The parties agree that service of discovery by
25 electronic means, including sending original electronic files by email or on a cd is
26 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

1 Electronic evidence conference certification: The parties further intend to
2 present evidence in electronic format to jurors for the purposes of jury deliberations
3 at trial. The parties discussed the presentation of evidence for juror deliberations but
4 did not reach any stipulations as to the method as this early stage.
5

6 Dated: June 11, 2024.
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9 **FREEDOM LAW FIRM**

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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: June 12, 2024